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10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,) Case No. CV 08-04189 RGK(JWJx)
16 Plaintiff,) [PROPOSED]
17 v.) CONSENT JUDGMENT OF FORFEITURE
18 \$252,012.86 IN BANK FUNDS)
19 SEIZED FROM TWO BANK OF)
20 AMERICA ACCOUNTS,)
21 Defendant.)
22

23 EDGAR KAROYAN, an)
24 Individual, ACM ENTERPRISES)
25 GROUP, INC., a California)
Corporation,)
Claimants.)

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27 On or about June 25, 2008, plaintiff United States of America
28 ("the United States of America") filed a Complaint for Forfeiture

1 alleging that the defendant \$252,012.86 in Bank Funds Seized From
2 Two Bank of America Accounts (the "defendant bank funds") is
3 subject to forfeiture pursuant to 18 U.S.C. § 984 and 31 U.S.C.
4 § 5317(c)(2).

5 Claimants Edgar Karoyan and ACM Enterprises Group, Inc. filed
6 verified claims to the defendant bank funds and answered the
7 Complaint. No other parties have appeared in this case, and the
8 time for filing claims and answers has expired.

9 The parties have now agreed to settle this action and to avoid
10 further litigation by entering into this Consent Judgment of
11 Forfeiture.

12 The Court having been duly advised of and having considered
13 the matter, and based upon the mutual consent of the parties
14 hereto,

15 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

16 1. This Court has jurisdiction over the subject matter of
17 this action and the parties to this Consent Judgment of Forfeiture.

18 2. The Complaint for Forfeiture states a claim for relief
19 pursuant to 18 U.S.C. § 984 and 31 U.S.C. § 5317(c)(2).

20 3. Notice of this action has been given as required by law.
21 No appearances have been made in this case by any person other than
22 claimants Edgar Karoyan and ACM Enterprises Group, Inc. The Court
23 deems that all other potential claimants admit the allegations of
24 the Complaint for Forfeiture to be true.

25 4. The sum of \$190,000.00 only (without interest) shall be
26 returned to claimants Edgar Karoyan and ACM Enterprises Group, Inc.
27 The remainder of the defendant bank funds, plus the interest earned
28 by the United States of America on the defendant bank funds in

1 their entirety, shall be condemned and forfeited to the United
2 States of America. The Internal Revenue Service is ordered to
3 dispose of the funds forfeited to the United States of America in
4 accordance with law.

5 5. The funds to be returned to claimants Edgar Karoyan and
6 ACM Enterprises Group, Inc. pursuant to paragraph 4 shall be
7 forwarded by check payable to "Geragos & Geragos, A Professional
8 Corporation, Attorney-Client Trust Account," and shall be mailed to
9 Shepard Kopp, Esq., Geragos & Geragos, A Professional Corporation,
10 644 South Figueroa Street, Los Angeles, California 90017-3411.

11 6. Claimants Edgar Karoyan and ACM Enterprises Group, Inc.,
12 and each of them, hereby release the United States of America, its
13 agencies, agents, officers, employees and representatives,
14 including, without limitation, all agents, officers, employees and
15 representatives of the Internal Revenue Service and the Department
16 of Justice and their respective agencies, as well as all agents,
17 officers, employees and representatives of any state or local
18 governmental or law enforcement agency involved in the
19 investigation or prosecution of this matter, from any and all
20 claims, actions, or liabilities arising out of or related to this
21 action, including, without limitation, any claim for attorney fees,
22 costs, and interest, which may be asserted by or on behalf of
23 claimants Edgar Karoyan and ACM Enterprises Group, Inc., or either
24 of them.

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1 7. The Court finds that there was reasonable cause for the
2 seizure of the defendant bank funds and institution of these
3 proceedings. Each of the parties hereto shall bear its own
4 attorney fees and costs.

5 DATED: July 23, 2009



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7 THE HONORABLE R. GARY KLAUSNER
8 UNITED STATES DISTRICT JUDGE
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CONSENT

The parties hereto consent to the above consent judgment of forfeiture and waive any right of appeal.

DATED: July 17, 2009

THOMAS P. O'BRIEN
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CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division
STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section

/s/ Victor A. Rodgers
VICTOR A. RODGERS
Assistant United States Attorney

Dated: July 16, 2009

GERAGOS & GERAGOS, APC

By /s/ Shepard S. Kopp
Mark J. Geragos
Shepard S. Kopp

Attorneys for Claimants
EDGAR KAROYAN, an individual and
ACM ENTERPRISES GROUP, INC., a
California corporation